

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROSLYN HARRIS and MARY ALLEN, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

PFIZER INC.,

Defendant.

Civil Action No. 1:21-cv-06789-DLC

**NOTICE OF MOTION TO DISMISS  
THE AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that pursuant to Rules 12(b)(1), 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, and upon the accompanying Memorandum of Law and Declaration of Colleen M. Gulliver and the exhibits attached thereto, Defendant Pfizer Inc. (“Pfizer”), through its undersigned counsel, moves to dismiss all claims asserted against Pfizer in the Amended Complaint filed on November 10, 2021 by Plaintiffs Roslyn Harris and Mary Allen. Pfizer will move this Court, before Denise L. Cote, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an Order granting Pfizer’s Motion to Dismiss the Amended Complaint in its entirety with prejudice.

Dated: December 1, 2021

Respectfully submitted,

**DLA PIPER LLP (US)**

/s/ Loren H. Brown

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